

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

HANAN ELATR KHASHOGGI,

Plaintiff,

v.

NSO GROUP TECHNOLOGIES LTD.
and Q CYBER TECHNOLOGIES LTD.,

Defendants.

Case No. 1:23-cv-779-LMB-LRVVAED

Action Filed: June 15, 2023

NOTICE OF DEFENDANTS' MOTION TO DISMISS COMPLAINT

TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendants NSO Group Technologies LTD. (“NSO”) and Q Cyber Technologies LTD. (“Q Cyber” and, collectively, “NSO”) have moved the Court, the Honorable Leonie M. Brinkema, United States District Judge, for an order dismissing Plaintiff’s Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(6), and the common law doctrine of *forum non conveniens*. Dkt. Nos. 23, 26. This motion is based on this Notice of Motion, the Motion and the attached Memorandum of Points and Authorities, the Declarations of Yaron Shohat (“Shohat Decl.”), Roy Blecher (“Blecher Decl.”), and Joseph N. Akrotirianakis (“Akro. Decl.”), the pleadings, papers and records on file in this case, and such oral argument as may be presented at any hearing on this motion.

Lead trial counsel for Defendants Joseph N. Akrotirianakis is available for a hearing on this motion on October 27, 2023, but Defendants have been informed that Counsel for Plaintiff is not available on that day. Lead trial counsel for Defendants is not available for hearing on November 3, 2023, because he is required to be present in the U.S. District Court for the Northern District of California for a hearing in another matter involving NSO on the afternoon of November 2, 2023. The Court will be closed on November 10, 2023, in honor of Veterans Day. Accordingly, Defendants respectfully request that the Court schedule a hearing on this motion for a date and time that is convenient to the Court.

DATED: October 2, 2023

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By: /s/ Edmund Power

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